

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

BEVERLEY C. SALAHUDDIN THOMPSON,

Plaintiff,

v.

THE TRUSTEES OF INDIANA UNIVERSITY, *et al.*,

Defendants.

No. 1:23-cv-02094-TWP-MKK

CORRECTED DECLARATION OF MARK NORRIS

I, Mark Norris, affirm the truth of the following representations:

1. I am an adult of sound mind, competent to testify to the matters described in this declaration. I also have personal knowledge of the facts and information as set forth in this declaration.

2. I am a police officer with the Indiana University Police Department (“IUPD”). In this role, I am involved in the investigation of sexual assault and/or sexual battery. I am also involved in the collection and preservation of sexual assault kits.

3. On October 13, 2021, I was dispatched to assist a wellness check regarding an IU student named Beverly Thompson, who was found intoxicated and in a state of undress. While on the scene, nothing indicated to me that Ms. Thompson had been sexually assaulted, or that Ms. Thompson was involuntarily intoxicated.

4. During the evening of October 13, 2021, I was dispatched to retrieve an anonymous sexual assault kit from IU Health – Bloomington Hospital. The kit was labeled Serial Number IN21-11685 PIN # 3404 and did not include any identifying information regarding the alleged victim. The kit also included no information on when or where the sexual assault took place.

5. While at IU Health – Bloomington Hospital, I do not recall receiving any identifying information regarding the anonymous sexual assault kit from medical staff.

6. I was unaware that Unreported Kit No. IN21-11658 was associated with Ms. Thompson until learning of this from defense counsel during this lawsuit.

7. In connection with this litigation, I reviewed a document entitled “Application for Benefits - Sex Crime Victims Services Fund” (Thompson-000301) with counsel.

8. In my time as a law enforcement officer, I do not recall ever receiving a copy of this type of application in connection with transporting anonymous sexual assault kit.


9. Although my signature appears on this document, I do not recall ever reviewing or receiving this document. I do not recall being provided a copy of this document on October 13, 2021.

10. As part of my discussions with counsel, I was informed that a redacted version of this document was located in IUPD’s records. The version of this document that was located has all personally identifiable information redacted.¹

11. To the best of my knowledge, IUPD officers are not involved in the redaction of these types of documents in the ordinary course of their duties. I did not redact this document. I have no personal knowledge of any other IUPD officer redacting this document.

Pursuant to 28 U.S.C. § 1746, I declare under penalty for perjury that the foregoing is true and correct.

Dated: 3/31/2025 _____.

By:  Signed by:
Mark Norris
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¹ Upon initial inspect, IUPD was unable to locate this document. However, the document was subsequently located on March 24, 2024.